## LOCAL BANKRUPTCY FORM 9013-4

## IN THE UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:

Fitzroy Simeon Lewis Heather Ann Lewis

Debtor(s)

BANK OF AMERICA, N.A.

Movant

v.

Fitzroy Simeon Lewis Heather Ann Lewis

Jack N. Zaharopoulos, Esq., Trustee **Debtors/Respondents** 

**CHAPTER 13** 

**CASE NO.** 21-00032 HWV

**Nature of Proceeding:** 

Motion for Relief from Stay

Document #: 47

## REQUEST TO CONTINUE HEARING/TRIAL WITH CONCURRENCE<sup>1</sup>

This request must be filed at least twenty-four (24) hours prior to the hearing. All requests must be approved by the Court. Submitting a request is not an automatic continuance.

The undersigned hereby requests a continuance with the concurrence of the opposing party (parties). This is a first request for a continuance.<sup>2</sup>

Reason for the continuance: The parties are in the process of negotiating a stipulation and need additional time to finalize the terms.

Contemporaneous with the filing of this request, the undersigned has served a copy of this request upon all counsel participating in this proceeding.

Dated: January 03, 2022 /s/ Sarah McCaffery, Esquire

Sarah McCaffery, Esquire Attorney for Movant

Phone Number: 215-942-2090

<sup>&</sup>lt;sup>1</sup> No alterations or interlineations of this document are permitted.

<sup>&</sup>lt;sup>2</sup> If this is not a first request for a continuance, then a Motion to Continue must be filed.